

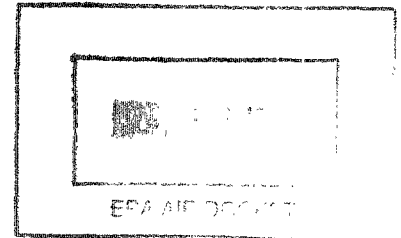
A-99-03

IV-D-01

COATINGS
UNLIMITED INC.

July 13, 1999

The Docket Clerk, Air and Radiation Docket and Information Office
401 M Street S.W., Room M-1500 (Mail Code 6102)
Waterside Mall, Washington DC 20460



Subject: Delisting of methyl ethyl ketone (MEK) as a HAP

To Whom It May Concern:

Coatings Unlimited Inc is an industrial painting company, performing shop and field work using special coatings that contain and are thinned with MEK. We use MEK as a proprietary solvent for most epoxies and urethanes. We also use it to clean our equipment, as we have found no other solvent to be adequate in most instances.

As a large quantity waste generator, we have been enrolled in our state's Pollution Prevention Planning program for two years. We have kept our shop emissions of HAP and VOC materials below air operating permit levels and continue to research and try new opportunities to reduce emissions in all our operations. Solvent substitutions (where possible,) training, high efficiency transfer equipment and recycling are on-site methods we have implemented to use MEK in an environmentally beneficial manner. Waste paint and still bottoms containing MEK are manifested to a TSDR for fuel blending energy recovery, completing the cycle.

Coatings Unlimited Inc strongly supports the MEK delisting petition to USEPA by the CHEMSTAR Ketones Panel on the merits of available data regarding actual levels of toxicity. We understand that EPA has determined that MEK exhibits low acute, chronic, developmental, reproductive and direct environmental toxicity risk.

We strongly urge EPA to act in all due haste so that important decisions regarding our operations using MEK can be made.

Sincerely,

A handwritten signature in black ink, appearing to be "P. Adams".

Paul D. Adams
Coatings Unlimited Inc ESH Coordinator